

RECEIVED

USDC, WESTERN DISTRICT OF LA
TONY R. MOORE, CLERK
SHREVEPORT, LOUISIANA
DATE 8/25/16
Smd

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

UNITED STATES OF AMERICA

- * CRIMINAL NO. 5:15-cr-00223-01
- *
- * 18 U.S.C. § 2241(c)
- * Aggravated Sexual Abuse of a Minor
- * 18 U.S.C. § 2243(a)
- * Sexual Abuse of a Minor
- * 18 U.S.C. § 2242(1)
- * Sexual Abuse
- *
- * DISTRICT JUDGE FOOTE
- * MAGISTRATE JUDGE HORNSBY

VERSUS

SHAWN D. DRIGGERS

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 2241(c)
Aggravated Sexual Abuse of a Minor under the age of 12 years

Beginning on or about September 27, 2007, and continuing until on or about the January 14, 2008, in the Western District of Louisiana, in the special maritime and territorial jurisdiction of the United States at Barksdale Air Force Base, the defendant, SHAWN D. DRIGGERS, did knowingly cause a minor, (C.D.), who had not attained the age of 12 years, to engage in sexual acts as defined in Title 18, United States Code, Section 2246(2), all in violation of Title 18, United States Code, Section 2241(c). [18 U.S.C. § 2241(c)].

COUNT 2

18 U.S.C. § 2243(a)
Sexual Abuse of a Minor between the ages of 12 and 16 years

Beginning on or about January 15, 2008, and continuing until an unknown date but reasonably near to the August 1, 2009, in the Western District of Louisiana, in the special maritime and territorial jurisdiction of the United States at Barksdale Air Force Base, the

defendant, SHAWN D. DRIGGERS, did knowingly cause and attempt to cause a minor, (C.D.), to engage in sexual acts as defined in Title 18, United States Code, Section 2246(2), said minor being between the ages of 12 and 16 years, and at least four years younger than the defendant, all in violation of Title 18, United States Code, Section 2243(a). [18 U.S.C. § 2243(a)].

COUNT 3
18 U.S.C. § 2242(1)
Sexual Abuse

On an unknown date between June 11, 2008 and October 4, 2008, in the Western District of Louisiana, in the special maritime and territorial jurisdiction of the United States at Barksdale Air Force Base, the defendant, SHAWN D. DRIGGERS, did knowingly cause and attempt to cause a person, (C.D.), to engage in a sexual act, as defined in Title 18, United States Code, Section 2246(2), by threatening and placing C.D. in fear, all in violation of Title 18, United States Code, Section 2242(1). [18 U.S.C. § 2242(1)].

A TRUE BILL:

REDACTED

FOREMAN OF THE GRAND JURY

STEPHANIE A. FINLEY
United States Attorney

By: Robert W. Gillespie, Jr.
ROBERT W. GILLESPIE, JR.
Assistant U.S. Attorney
(LA Bar No. 6202)
300 Fannin Street, Suite 3208
Shreveport, LA 71101
(318) 676-3608

By: John Luke Walker
JOHN LUKE WALKER
Assistant U.S. Attorney
(LA Bar No. 18077)
800 Lafayette Street, Suite 2200
Lafayette, LA 70501
Telephone: (337) 262-6618